

ORIGINAL

February 9, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

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**RECEIVED**

FEB - 9 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: Ex Parte Presentation  
CC Docket No. 99-200  
(Number Resource Optimization)**

Personal  
Communications  
Industry  
Association

Dear Ms. Salas:

On Wednesday, February 9, 2000, the Personal Communications Industry Association ("PCIA"), represented by Harold Salters, along with Todd Daubert of Kelley Drye & Warren LLP, met with Tejal Mehta of the Common Carrier Bureau's Network Services Division, regarding the above-referenced proceeding.

PCIA stated its positions, presented in its Comments and Reply Comments in this proceeding, concerning the need for a unified national framework for number conservation issues, the severe burdens imposed by individual State reporting requirements, the anti-competitive impacts of State actions taken in the wake of FCC authority delegations, and the need for codification and FCC enforcement of numbering guidelines. PCIA's Blueprint for Efficient Number Utilization was presented.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter are being filed with your office. If you have any questions regarding this filing, please feel free to contact me at (703) 535-7492.

Sincerely,



Harold Salters  
Director – Government Relations  
Personal Communications Industry Association

cc: Tejal Mehta, NSD/CCB

Attachment

OH

**PCIA Blueprint For Efficient Number Utilization**

The FCC should, in all circumstances, assure that telephone numbers are available on a timely nondiscriminatory basis. To accomplish this goal:

- The FCC must require the states and, indirectly, the local exchange carriers, to consolidate rate centers to the maximum extent possible, consistent with public safety requirements.
- The FCC must require mandatory 10-digit dialing in areas approaching exhaust, and permissive 10-digit dialing elsewhere.
- The FCC must take action to encourage states to use all-service overlays when implementing new area codes to ensure adequate number resources are available for non-Local Number Portability ("LNP") capable carriers.
- The FCC and the industry must immediately examine the costs and benefits of utilizing the "D" digit, and other technological methods of using central office codes more efficiently, to determine if such use is economically and technically feasible.
- The FCC must require all NXX codes to be utilized within a reasonable period of time with adequate safeguards to reclaim unused codes, including protected codes.

If the FCC requires number pooling as a conservation method, its rules should assure that:

- The Central Office Code Administrator ("CO Administrator") (who administers full NXX codes under federal guidelines) and the Pooling Administrator(s) allocate both full codes and partial codes, respectively, in accordance with number conservation and efficient utilization principles. For example, the Pooling Administrator(s) should be required fully to assign numbers within an NXX code amongst carriers in a rate center before opening the next full NXX code in a rate center for pooling; *e.g.*, use up partial codes before opening whole codes when possible.
- Telecommunications carriers that are not LNP-capable must not be required to take numbers from the pool, or to contribute numbers to

the pool or otherwise participate in pooling in any fashion. These carriers must be able to continue to receive whole 10,000 blocks of numbers available within the NPA from the Central Office Code Administrator.

- Prior to implementing pooling, the number of rate centers within the NPA must be reduced to the maximum extent technically feasible, consistent with public safety requirements. Reduction of at least 50% would be considered substantial compliance with this rule. State commissions must be required to certify to the FCC that they have complied with this rule at least 60 days prior to implementing pooling, unless a state commission certifies to the FCC that it is technologically unfeasible to do so because of public safety requirements.
- The CO Administrator shall inform state commissions at least 18 months in advance of forecasted exhaust of an NPA. States, under their delegated authority, shall take all necessary and lawful area code relief steps reasonably available to assure that no rationing is required in order to meet the forecasted demand.
- Unless a specific code relief plan has been ordered by a state commission and is no longer subject to review or appeal, prior to 180 days of predicted NXX exhaust, the Code Administrator or any affected party may petition the FCC automatically to implement area code relief, in the form of an all-service overlay. Mandatory 10-digit dialing would be required to begin no later than the date on which additional area code relief is implemented.